THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

TANANGELA N. ANDERSON,

Plaintiff,

v. No: 2:16-CV-02652

Jury Demanded

TENNESSEE QUADEL CONSULTING CORPORATION, a Tennessee Corporation; and JOHN DOES 1 through 20 inclusive,

Defendants.

MOTION TO WITHDRAW

COMES NOW undersigned counsel for Tanangela Anderson, Plaintiff, and for his Motion to Withdraw as counsel for Plaintiff states:

- 1. A Status Conference is set in this case on January 2, 2018 at 1:30 PM before the Court. This matter is set for trial beginning January 8, 2018.
- 2. The parties were participating in good faith in settlement discussions attempting to resolve this matter. Undersigned counsel has experienced difficulties contacting Plaintiff in the past. Undersigned counsel last spoke with Plaintiff on December 4, 2017. Despite repeated attempts to contact Plaintiff, Counsel and his office have not been able to contact Plaintiff since that date. Plaintiff has failed to return calls or otherwise communicate with Counsel regarding any further settlement discussions or for trial preparation.

- 3. Pursuant to Local Rule 83.5, Undersigned Counsel moves this Court for leave to withdraw from representation of Plaintiff. Counsel submits there is good cause to withdraw. Plaintiff has failed to communicate with Counsel, rendering his ability to effect settlement or prepare for trial unreasonably difficult.
- 4. Undersigned Counsel has served upon Plaintiff a copy of this Motion to Withdraw, and will continue attempts at contacting Plaintiff.
- 5. Plaintiff's counsel has contacted Defense Counsel in accordance with the Local Rule 7.2(a)(1)(B), and she has no objection to this Motion.

WHEREFORE, Plaintiff prays this Court grant this Motion to Withdraw, and for all other proper relief.

Respectfully submitted, TANANGELA ANDERSON

By: _/s/ Bryan R. Huffman
Bryan R. Huffman, B.P.R. 030050
HUFFMAN LAW FIRM, PLLC
P.O. Box 944
131 W. Liberty Ave.
Covington, TN 38019
(901) 726-3854
(901) 726-3539 (Facsimile)
bryan@huffmanfirm.com

Certificate of Service

I, Bryan R. Huffman, hereby certify that on this 20th day of December, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notification of such filing to the following:

ANGIE C. DAVIS
EMMA J. REDDEN
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC
First Tennessee Building
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
901-577-8110- telephone

I, Bryan R. Huffman, Attorney for Plaintiff, hereby certify that on this 20th day of December, 2017, I mailed a copy of the foregoing Motion to Withdraw by United States mail, first class, postage prepaid to:

Tanangela N. Anderson 1117 Canary Lane Memphis, TN 38109

> <u>/s/ Bryan R. Huffman</u> Bryan R. Huffman